

CAUSE NO. DC-19-09828

D&T PARTNERS, LLC (successor in interest
to ACET VENTURE PARTNERS, LLC),

Plaintiff,

v.

ACET GLOBAL, LLC;
BAYMARK ACET HOLDCO, LLC;
BAYMARK ACET DIRECT INVEST, LLC;
BAYMARK MANAGEMENT, LLC;
BAYMARK PARTNERS;
DAVID HOOK; TONY LUDLOW; and
WINDSPEED TRADING, LLC,

Defendants.

IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

116th JUDICIAL DISTRICT

AFFIDAVIT OF MONICA PLASKETT

BEFORE ME, the undersigned Notary Public, personally appeared Monica Plaskett, known to me as the person whose name is subscribed to the instrument herein below, and being duly sworn, upon oath, deposes and states as follows:

1. My name is Monica Plaskett, and I am a resident of Collin County, Texas. I am over 18 years of age, am of sound mind, have personal knowledge of the factual statements herein, and am competent and authorized to make this affidavit.

2. I was employed by ACET Venture Partners, LLC ("ACET Venture Partners") and later ACET Global, LLC ("ACET Global") as the Director of Operations from approximately 2013 to June 2018. I was involved in multiple aspects of ACET Venture Partners' business, such as: managing the office; overseeing the hiring and firing of personnel; and managing the order, sale, and distribution of products.

3. I worked closely with Tomer Damti ("Mr. Damti") and helped develop the business of ACET Venture Partners. I was a part of ACET Venture Partners' operations before any of the Defendants listed above were involved in any way with ACET Venture Partners.

4. While Mr. Damti was initially excited about doing business with “Baymark,” I initially had concerns about the legitimacy of the Baymark parties¹ and the Baymark parties’ business proposition.

5. After ACET Global acquired the assets of ACET Venture Partners, I continued to oversee the operations of ACET Venture Partners (then ACET Global). I regularly met with Mr. Damti, CEO of ACET Global, regarding the business and operations even after the Baymark parties got involved.

6. After ACET Venture Partners transitioned to ACET Global, the Baymark parties brought in William Szeto (“Bill”). To my knowledge, Bill was supposed to help ACET Global with the importation of products. However, Bill did not generally help me or Mr. Damti with business operations; it appeared that the Baymark parties placed Bill in the office specifically to observe ACET Global’s business operations and Mr. Damti.

7. Mr. Damti was fired from his position as CEO of ACET Global. Despite the fact that Mr. Damti was involuntarily terminated, David Hook came to the ACET Global office and told me and other staff that changes needed to be made, and Mr. Damti left voluntarily. Approximately two days after Mr. Damti was fired, Bill became acting CEO of ACET Global.

8. After Mr. Damti’s firing and Bill becoming acting CEO of ACET Global, I fulfilled even more roles at ACET Global. It appeared to me that Bill was not familiar with ACET Global’s operations, so he heavily relied on me and regularly called me to his office.

9. Further, after Mr. Damti’s firing, Bill poisoned the staff against Mr. Damti. He would openly talk badly about Mr. Damti. On one occasion, Bill held a meeting and disclosed how much

¹ For purposes of this Affidavit, “Baymark parties” generally refers to David Hook and Tony Ludlow, as well as the following entities: Baymark ACET Holdco, LLC; Baymark ACET Direct Invest, LLC; Baymark Management, LLC; and Baymark Partners.

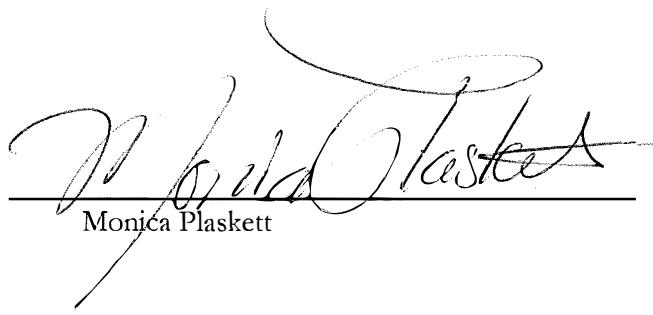
money Mr. Damti had been making and even suggested that Mr. Damti was trying to keep more money for himself. Additionally, Bill showered the staff with gifts and merchandise—what I thought was a bribe.

10. In June 2018, Bill called me into his office and mentioned that ACET Global had a high amount of debt and that he was going to “start another business.” He suggested he “had friends,” and that if ACET Global went bankrupt, Bill could continue the operations with a new company.

11. Later in June 2018, I resigned from my position with ACET Global. Bill did hire me back as a part-time contractor a week later, but I left ACET Global completely soon after.

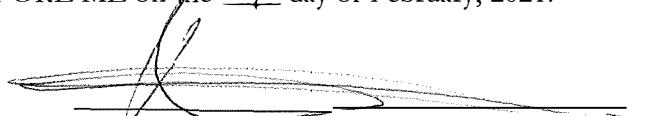
12. After I resigned, I found out that ACET Global’s business operations were now operating under Windspeed Trading LLC (“Windspeed”). A vendor I worked with while at ACET Global, Rick, told me the same business was now operating as Windspeed. According to the vendor, Windspeed was selling the same products, using the same product descriptions, and using the same vendor and customer contacts as ACET Global when I worked there.

Further, affiant sayeth not.



Monica Plaskett

SWORN TO AND SUBSCRIBED BEFORE ME on the 24 day of February, 2021.



NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

